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Honorable Timothy W. Dore
Chapter 7
Hearing Location: Seattle, Rm. 8106
Hearing Date: February 14, 2025
Hearing Time: 9:30 a.m.
Response Date: February 7, 2025

5
6 UNITED STATES BANKRUPTCY COURT
7 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 In re:
9 WIRELESS ADVOCATES, LLC

10 Debtor.

11 Case No. 23-10117-TWD

12 **NOTICE OF HEARING ON
MOTION OF CHAPTER 7 TRUSTEE
FOR ORDER APPROVING
SETTLEMENT WITH TRIPLE R
SELLER, INC.**

13 TO: WIRELESS ADVOCATES, LLC, Debtor;
14 AND TO: TRIPLE R SELLER, INC.;
AND TO: UNITED STATES TRUSTEE;
AND TO: SPECIAL NOTICE LIST;
AND TO: PARTIES ENTITLED TO NOTICE UNDER CASE MANAGEMENT ORDER

15 PLEASE TAKE NOTICE that a hearing has been scheduled on **February 14, 2025, at 9:30**
16 a.m. (PT) before the Honorable Timothy W. Dore, United States Bankruptcy Judge, in Courtroom
17 8106, 700 Stewart Street, Seattle, WA, 98101 on the Chapter 7 Trustee's Motion for Order
Approving Settlement with Triple R Seller, Inc. (the "Motion").

18 By the Motion, the Trustee seeks approval of the terms of a settlement with Triple R Seller,
19 Inc. to resolve the proof of claim filed by Tylt, Inc. for \$21,206,160.00 and the estate's counterclaims
against Tylt, Inc. As set forth in the Motion, the Trustee and Triple R Seller, Inc. have reached a
20 settlement whereby Triple R Seller shall have an allowed general unsecured claim in the amount of
\$10 million in full resolution of the Tylt Inc. proof of claim and the estate's counterclaims. Further
21 details regarding the settlement are set forth in the Motion and the Trustee's declaration in support of
the motion. As described in the Motion, the Trustee believes that the settlement is in the best interests
22 of the estate and its creditors.

23 PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may
be (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street,
24 Seattle, WA 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz,
Paralegal, K&L Gates, LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email:
25 denise.lentz@klgates.com.

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NOTICE OF HEARING ON MOTION OF CHAPTER 7
TRUSTEE TO APPROVE SETTLEMENT - 1
508859331.3

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: +1 206 623 7580
FACSIMILE: +1 206 623 7022

1 PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file
2 your written objection NO LATER THAN **February 7, 2025**. Objections must be filed with the Court,
2 700 Stewart Street, Seattle, WA, 98101, and a copy delivered to:

3 Brian Peterson
4 K&L Gates, LLP
5 925 Fourth Avenue, Suite 2900
Seattle, Washington 98104

6 PLEASE TAKE FURTHER NOTICE that in accordance with Local Bankruptcy Rule 9013-
7 1(d)(7), failure to timely file and serve an objection to the Motion may be deemed by the Court an
admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
8 Rule 9013-1(e), failure to appear at the hearing on the Motion may be deemed by the Court to be an
admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
9 Rule 9013-1(f), if no opposition to the Motion is timely filed and served, the Court may either (a) grant
the Motion by default at the hearing, or (2) grant the Motion prior to the hearing on the Trustee's ex
10 parte presentation of a proposed order accompanied by proof of service and a declaration that no
objection to the Motion was timely received.

11 Dated this 23rd day of January, 2025.

12 K&L GATES LLP

13 /s/ Brian T. Peterson

14 Michael J. Gearin, WSBA #20982
Brian T. Peterson, WSBA # 42088
15 K&L GATES LLP
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16 Seattle, WA 98104-1158
Telephone: (206) 623-7580
17 Email: michael.gearin@klgates.com
brian.peterson@klgates.com
18 *Attorneys for Virginia Burdette, Chapter 7
Trustee*

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NOTICE OF HEARING ON MOTION OF CHAPTER 7
TRUSTEE TO APPROVE SETTLEMENT - 2
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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on January 23, 2025, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 23rd day of January, 2025 at Seattle, Washington.

/s/ *Denise A. Lentz*
Denise Lentz

**NOTICE OF HEARING ON MOTION OF CHAPTER 7
TRUSTEE TO APPROVE SETTLEMENT - 3
508859331.3**

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